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December 21, 2020

BY ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **King v. Fedcap Rehabilitation Services, Inc., et al., 20-Civ-1784 (VSB) (DF)**
Request To Further Extend Time to Answer, Move, or Otherwise Respond to
First Amended Class and Collective Action Complaint

Dear Judge Broderick:

We represent Plaintiff Harold King ("Plaintiff") in the above-identified matter and write, jointly with counsel for the Defendants, to request that the Court further extend Defendants' time to answer, move, or otherwise respond to the First Amended Class and Collective Action Complaint ("Complaint") from January 8, 2021 to and including February 19, 2021. As the parties previously advised, the parties have been engaged in ongoing discussions about potential settlement of this matter, which was delayed and further complicated because of the potential inclusion of an additional named plaintiff. Since our last letter, the parties exchanged information about this potential new plaintiff, and Plaintiff made an initial settlement demand to fully resolve Plaintiff's individual claims. Defendants made a counter offer on December 18, 2020. The parties believe resolution of this matter through settlement is achievable with further discussions, and agree that settlement is the most expeditious and efficient way to bring this case to a close.

Acknowledging that this is the parties' fourth request, and appreciative of the fact that Your Honor has already granted three extensions, the parties believe that a further extension of Defendants' time to answer, move, or otherwise respond to the Complaint will allow them to maintain the momentum they now have achieved, without the distraction of intervening additional pleadings or motion practice. The contemplated extension would not affect any other scheduled deadlines.

Thank you for Your Honor's consideration of this request.

Respectfully,

/s/ Anne Seelig

Anne Seelig

cc: Jeffrey H. Ruzal (via ECF)
Adriana S. Kosovych